UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

RUDY ST. GERMAIN, an individual,

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Plaintiff,

VS.

TREIF USA, INC., d/b/a TREIF, TREIF USA, a Delaware corporation; and TREIF MASCHINENBAU GMBH, d/b/a TREIF, a German corporation,

Defendants.

No. 2:18-cv-01600-BJR

STIPULATED JOINT MOTION AND ORDER REGARDING COMPLETION OF SPECIFIC DEPOSITIONS BY OCTOBER 1, 2019

NOTE ON MOTION CALENDAR: September 4, 2019

STIPULATION & JOINT MOTION REGARDING COMPLETION OF SPECIFIC DEPOSITIONS BY OCTOBER 1, 2019

The parties Plaintiff Rudy St. Germain and Defendants Trief USA and Treif Maschinenbau GmbH by and through their counsel of record, are appearing for mediation of this case on September 10, 2019. In order to avoid unnecessary expense and to not delay mediation, the parties hereby stipulate and seek an Order that the following depositions can be

STIPULATED JOINT MOTION AND ORDER REGARDING COMPLETION OF SPECIFIC DEPOSITIONS BY OCTOBER 1, 2019 (Cause No. 2:18-cv-01600-BJR) – 1 bp/WLCS6814.001/3227341x



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taken after the mediation (which is after the discovery cutoff of September 4, 2019) but are to be completed by October 1, 2019: 3 4 1. 30(b)(6) Treif Maschinenbau 5 2. 30(b)(6) Treif USA 6 3. Carsten Wiele 7 4. Cleve Wix 8 5. Joellen Gill 9 10 The September 4, 2019 discovery cutoff is not extended with the exception of conducting the above listed depositions to occur by October 1, 2019. In addition, to 11 accommodate the foregoing depositions, the parties agree that the deadlines for the Pretrial 12 13 Statement will be as follows: 14 September 23, 2019: Plaintiff's pretrial statement 15 September 30, 2019: Defendant's pretrial statement 16 October 7, 2019: Joint pretrial statement 17 DATED this 3rd day of September, 2019. 18 19 By: s/Whitney L.C. Smith 20 s/Gabriella Wagner Whitney L.C. Smith, WSBA No. 21159 21 Gabriella Wagner, WSBA No. 42898 22 WILSON SMITH COCHRAN DICKERSON 901 Fifth Avenue, Suite 1700 23 Seattle, WA 98164-2050 24 Telephone: (206) 623-4100 Fax: (206) 623-9273 25 Email: smithw@wscd.com Email: wagner@wscd.com 26



Attorneys for Defendants

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Attorneys for Plaintiff



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ORDER

THIS MATTER having come before the above-entitled Court upon the parties agreed Stipulation, in accordance with FRCP 16(b), NOW THEREFORE it is hereby:

ORDERED, ADJUDGED, AND DECREED Order that the following depositions can be taken after the discovery cutoff of September 4, 2019 but are to be completed by October 1, 2019:

- 1. 30(b)(6) Treif Maschinenbau
- 2. 30(b)(6) Treif USA
- 3. Carsten Wiele
- 4. Cleve Wix
- 5. Joellen Gill

IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that the September 4, 2019 discovery cutoff is not extended with the exception of conducting the above listed depositions by October 1, 2019.

Dated this 6th day of September, 2019.

BARBARA JACOBS ROTHSTEIN UNITED STATES DISTRICT JUDGE